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8 IN THE UNITED STATES DISTRICT COURT

9 EASTERN DISTRICT OF CALIFORNIA

10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$1,537,494.74
15 SEIZED FROM CHASE BANK, and

16 APPROXIMATELY \$2,601.24 SEIZED
17 FROM BANK OF AMERICA,

Defendants.

2:21-MC-00199-WBS-JDP

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

18 It is hereby stipulated by and between the United States of America and potential claimant Ru
19 Cong Ye (“claimant”), by and through their respective counsel, as follows:

20 1. On or about May 24, 2021, claimants filed a claim in the administrative forfeiture
21 proceeding with the U.S. Customs and Border Protection (“CBP”) with respect to the Approximately
22 \$1,537,494.74 seized from Chase Bank and Approximately \$2,601.24 seized from Bank of America
23 (hereafter “defendant assets”), which were seized on August 3, 2020 and August 4, 2020.

24 2. CBP has sent the written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to
25 all known interested parties. The time has expired for any person to file a claim to the defendant assets
26 under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a claim to the defendant
27 assets as required by law in the administrative forfeiture proceeding.

1 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
2 forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets are
3 subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture
4 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.
5 That deadline is August 22, 2021.

6 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to
7 September 21, 2021, the time in which the United States is required to file a civil complaint for forfeiture
8 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject
9 to forfeiture.

10 5. Accordingly, the parties agree that the deadline by which the United States shall be
11 required to file a complaint for forfeiture against the defendant assets and/or to obtain an indictment
12 alleging that the defendant assets are subject to forfeiture shall be extended to September 21, 2021.

13 Dated: 08/19/21

PHILLIP A. TALBERT
Acting United States Attorney

14 By: /s/ Kevin C. Khasigian
15 KEVIN C. KHASIGIAN
16 Assistant United States Attorney

17
18 Dated: 08/19/21

/s/ Seth P. Chazin
19 SETH P. CHAZIN
20 Attorney for potential claimant
 Ru Cong Ye
 (Signature authorized by phone)

21
22 **IT IS SO ORDERED.**

23
24 Dated: August 20, 2021


25 WILLIAM B. SHUBB
26 UNITED STATES DISTRICT JUDGE